Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management (BLM)
Salem District, Oregon

Gotaway Alder Timber Sale
DOI-BLM-OR-S050-2012-0002-DNA

A. Background and Description of the Proposed Action

The BLM analyzed the Gotaway Alder Timber Sale as part of the Gotaway Thinning Timber Sale Environmental Assessment (EA# OR080-00-08) in 2001. The project entails hardwood conversion on approximately seven acres. Thinning of 45 year old red alder dominated stands in the Matrix and Riparian Reserves land use allocations will occur. The action includes the cutting and removal of hardwoods to release the minor conifer component. The area will be planted with a mixture of Douglas-fir, western hemlock, and western red cedar after harvest operations are completed.

The intent of the proposed action is to develop a diversity of conifer species in a stand currently dominated by red alder and to create future coarse wood debris within convertible lands (EA, p. 5). No road work would be required. All trees would be ground-based yarded.

Location: T. 14 S., R. 7 W., Section 36; Willamette Meridian within the Upper Alsea River Watershed in Benton County, Oregon.

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

The analysis documented in Gotaway Thinning EA is site-specific and supplements analyses found in the *Salem District Proposed Resource Management Plan/Final Environmental Impact Statement,* September 1994 (RMP/FEIS). The Gotaway Thinning projects, which includes the Gotaway Alder Timber Sale, was designed under the *Salem District Record of Decision and Resource Management Plan*, May 1995 (1995 RMP) and related documents which direct and provide the legal framework for management of BLM lands within the Salem District. All of these documents may be reviewed at the Salem District office.

The Gotaway Alder Timber Sale conforms to the Salem District Resource Management Plan/Forest Land and Resource Management Plan as amended by the 2001 *Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines* (2001 ROD), as modified by the 2011 Settlement Agreement (*Conservation Northwest, et al. v. Rey, et al.*, No. 08-1067 (W.D. Wash.) July 2011, IM-OR-2011-063).

The proposed action is in conformance with the applicable LUPs because it is specifically

provided for in the following LUP decisions:

- Produce a sustainable supply of timber and other forest commodities to provide jobs and contribute to community stability (RMP, p. 20)

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

Applicable NEPA Documents:

- Gotaway Thinning Timber Sale EA/FONSI (OR080-00-08) – Signed May 30, 2001.

Other NEPA documents and other related documents that are relevant to the proposed action include:

- Salem District RMP/EIS – November 1994 and Record of Decision – May 1995
- South Fork Alsea River Watershed Analysis – 1995
- Gotaway Thinning Timber Sale Project File
- Gotaway Alder Timber Sale DNA – 2013

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?

Yes. The proposed action would be completed as described and analyzed in the Gotaway Thinning EA/FONSI (pp. 19-20). Changes include an additional stream identified in the project area. The stream is spring-fed and perennial and is non fish-bearing. Based on a tree height of 60-100 feet and hillslope less than 30%, the BLM has applied a 50 foot no-cut buffer. The interdisciplinary team reviewed this information and determined that the proposed action would not result in any adverse effects to this stream.

EA Excerpt:

"Approximately 7 acres of red alder dominated forest on Matrix lands (portion of unit 7 hardwood conversion area) would be cut and yarded. Unmerchantable material would be grapple and/or shovel piled, covered with plastic and burned during the wet season. Compacted areas designated by the Authorized Officer would be sifted using grapples or shovel tongs to loosen the compaction. The area would be planted with a mixture of western hemlock, western red cedar and Douglas-fir. Existing conifer trees would be reserved and protected where feasible.

Approximately 0.5 acre of hardwood overstory/conifer understory forest on Matrix would be treated by cutting and yarding a portion of the red alder overstory. Existing conifer trees would be reserved and protected where feasible. The retained portion of red alder would provide approximately 60 percent full sunlight to the existing conifers. The additional light

provided to the existing conifer understory would enhance their overall growth and viability."

2. **Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?**

   The Gotaway Thinning EA analyzed a No Action and the Proposed Action alternatives. No other reasonable alternatives to achieving the purpose and need were identified by the Interdisciplinary Team or the public. No new environmental concerns, interests, resource values, or circumstances have arisen since the EA was published that would required the development of additional alternatives. A full description of the alternatives can be found in Section II of the EA, pp. 5-6.

3. **Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?**

   Carbon sequestration and climate change has become an issue addressed in EAs since the release of the Gotaway Thinning EA in 2001. The Gotaway Thinning EA is tiered to the 1995 RMP, which concluded that thinning as described in this proposed action would have a negligible effect on carbon dioxide levels. Responsive to public comment, the BLM has elected to include project level analysis of carbon storage emissions on several thinning projects since. Analyses completed for projects of similar or greater scope, treatment type, stand type, and scale have supported the conclusion of the 1995 RMP that project emissions would be negligible (Revised Upper and Lower Alsea Watershed Enhancement EA, 2010).

   Since the release of the EA in 2001, an additional stream has been identified in the project area. The stream is spring-fed and perennial and is non fish-bearing. Based on a tree height of 60-100 feet and hillslope less than 30%, the BLM has applied a 50 foot no-cut buffer. The interdisciplinary team reviewed this information and determined that the proposed action would not result in any adverse effects to this stream.

   There is no new significant information or circumstances relative to the analysis in the Gotaway Thinning EA and the current proposed action. The analysis and conclusions in the EA are appropriate and adequate.

4. **Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the proposed action?**

   There are no changes in resource conditions from when the EA was published in 2001. There are no changes in resource-related plans, policies or programs of other government agencies or Indian tribes. There are no changes in statute, case law, or regulation that would affect the implementation of the Gotaway Alder Timber Sale.

5. **Are the direct, indirect, and cumulative effects of the current proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document(s)?**

The Gotaway Thinning EA analyzed direct, indirect, and cumulative effects of the proposed action on affected resources (vegetation, soils, fuels, water and riparian, wildlife, fisheries, and visual resources). There are no substantial changes from those addressed in the analyses to the present.

6. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action?

Public involvement for the Gotaway Thinning EA has been adequate. Scoping letters in 2000 were sent to 96 potentially affected and or interested individuals, groups, and agencies. The EA and FONSI were made available for a 30 day public review on May 30, 2001. A description of the project was again presented for public comment in the Spring 2012 Project Update publication. No comments were received.

No comments were received on the proposed actions that lead the Decision Maker to believe the analysis, data, or conclusions in the EA were in error or that the selected action needed to be altered.

Consultation

Wildlife: The BLM originally completed consultation with the U. S. Fish and Wildlife Service (USFWS) in 1999, under the *Programmatic Biological Assessment of Fiscal Year 2001 Projects in the North Coast Province which would modify the habitats of Bald Eagles, Northern Spotted Owls, or Marbled Murrelets* (August 11, 1999). A final Biological Opinion was received on October 4, 2000. However, this project was not implemented under this consultation.

The BLM reinitiated informal consultation and conferencing with the U.S. Fish and Wildlife Service (USFWS) in the fall of 2012. The Gotaway Alder Hardwood Conversion Project Biological Assessment is tiered to the Fiscal Years 2013-2014 Habitat Modification Projects in the North Coast Planning Province (01EOFW00-2012-I-0124) and will follow all conservation measures within that consultation. The USFWS, in a letter dated December 13, 2012, concurred with the BLM's finding that the Gotaway Alder Timber Sale would not likely adversely affected spotted owls, marbled murrelets, or critical owl habitat.

Fish: The proposed project would not affect Oregon Coast coho salmon. Treatments would avoid the RR, except for one small stream, leaving 210 foot buffers intact near stream channels. The effected small stream below the project area drains through a flat irregular drainage area with a heavy debris load and dense brush coverage with no visibly defined channel. The treatments would leave a proposed 50 foot buffer that would have no affect on stream temperature in the South Fork Alsea during summer due to these conditions downstream of the project site. Only ground based operations would occur during the dry season at least 50 feet from any stream course on gentle slopes, thus avoiding the potential for sediment delivery. The nearest OC coho salmon habitat is below the Alsea Falls, more than a mile downstream of the project area. Based on the no-effect determination consultation is not required for the proposed action.

E. Interdisciplinary Analysis

Name	Specialty
Steve Cyrus	Engineer
Ron Exeter	Botanist
Scott Hopkins	Wildlife Biologist
Stefanie Larew	NEPA Coordinator
Kent Mortensen	Fuels Specialist
Scott Snedaker	Fish Biologist
Hugh Snook	Silviculturist
Steve Wegner	Hydrologist

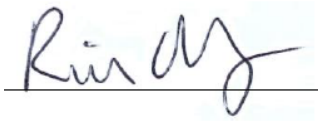
Prepared and Reviewed By

1/8/2013

NEPA Coordinator Date

CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.



1/8/13

Rich Hatfield Date
Marys Peak Resource Area Field Manager